


FORM OF ORDER SHEET

Court of _____

Appeal No: 2078/2023

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 17/10/2023 | <p>The appeal of Mr. Hashmat Khan received today by registered post through Sheikh Ifikhar-ul-Haq Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____ Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p> |

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR CAMP COURT DERA ISMAIL KHAN

Service Appeal No. 2078 / 2023

Hashmat Khan Versus Govt. of KPK etc

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| 1. | Grounds of service appeal with affidavit | -- | 1-4 |
| 2. | Copies of the advertisement, recommendation letters, writ petition, status quo, judgment and copy of the appointment order of the colleagues and copy of the appointment order of appellatant record & <i>departmental Appeal</i> | A & A/ To A/B | 5 30 |
| 3. | Vakalatnama | -- | -31- |

Dated: 12/10/2023

Humble Appellant



Hashmat Khan
Through Counsel



Sheikh Iftikhar ul Haq
Advocate Supreme Court

0345 9785920

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR CAMP COURT DERA ISMAIL KHAN

Service Appeal No. 2078 / 2023

Hashmat Khan son of Gulla Khan r/o Darazinda Tehsil
Darazinda District Dera Ismail Khan. 0343-970 9886

VERSUS

(APPELLANT)

1. Government of Khyber Pakhtunkhwa through Secretary Education Department, Peshawar.
2. Director Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
3. **District Education Officer** (Male) Dera Ismail Khan.
4. **Sub Divisional Education Officer** (Male) Dera Ismail Khan.
5. **District Accounts Officer** Dera Ismail Khan.

(RESPONDENTS)

SERVICE APPEAL U/S 4 OF KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974.

Prayer:

On acceptance of instant service appeal, the appellant's appointment be considered from the date of 09/11/2021 instead of 09/09/2022 along with all back benefits including monthly salaries & other emoluments & seniority i.e. considering the services of the appellant from the date of 09/11/2021 instead of 09/09/2022 as *appellant's* their 3 colleagues be recommended/appointed on this same date i.e. 09/11/2021.

Respectfully Sheweth;

Appellant humbly submits and requests as under:-

1. That the respondents advertised various posts including posts of SST (IT), wherein the appellant also applied for the post of SSTIT and was placed at serial No. 4 in the merit list of SST (IT) and was recommended for appointment on 09/11/2021 along with their other colleagues. One Samiullah Khan Challenged the appointment of appellant on the basis of disable quota in WP//410-D/2021, wherein that case status quo was granted in favour of Samiullah. Later on the writ petition of Samiullah was dismissed on 29/06/2022 and the appellant was appointed on 09/09/2022 with immediate effect. Although the appellant was entitled to be appointed on 09/11/2021 on the date upon which the appellant was recommended along with his three other colleagues. Copies of the advertisement, recommendation letters, writ petition, status quo, judgment and copy of the appointment order of the colleagues and copy of the appointment order of appellant record are annexed as Annexure-A to Ap To A/6
2. That the appellant feeling aggrieved from the acts and omissions, from the appointment order of the appellant as in the appointment order was from the immediate effect and not from the date of 09/11/2021 as the appellant was recommended for the said post and his colleagues were appointed, hence, the appellant submitted departmental appeal on 05/07/2023 which was not responded, meaning thereby rejected, hence, the instant service appeal after the stipulated period, inter alia, on the following grounds.

GROUNDS: -

- A. That, the acts and omissions of respondents are against law by not considering the date of appointment of petitioner as 09/11/2021.
- B. That the order of the appointment of appellant is not in commence of EASTA Code to the extent by not considering

the appellant from the date of recommendation, hence, the order of the appointment of the appellant is liable to be modified.

- C. That the appellant is entitled to be considered from the date of recommendations i.e. 09/11/2021 in the light of judgment of superior courts as well as, as per principle of law, service rules, service policy because after the well versed and genuine recruitment process, the appellant was recommended along with their colleagues. Hence, the appellant is also be dealt in accordance with law with no discrimination as per article 4 & 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- D. That the acts and omissions of the respondents/authority are against the principle of law, service acts & rules, and also against the natural justice.
- E. That counsel for the appellant may please be allowed to raise additional grounds at the time of arguments.

It is therefore humbly prayed that the instant service appeal may kindly be accepted as prayed for in the headnote and contents of appeal.

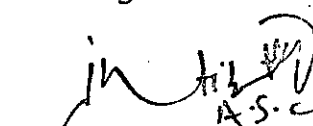
Any other appropriate relief, which this Honourable Court deems fit in the circumstances of case, may also be granted to the petitioner.

Dated: 12 /10/2023

Humble Appellant



Hashmat Khan
Through Counsel



Sheikh Ifkhar ul Haq
Advocate Supreme Court

03459285920

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. _____ / 2023

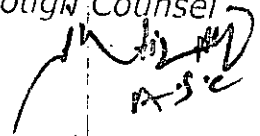
Hashmat Khan Versus Govt. of KPK etc

SERVICE APPEAL

CERTIFICATE

Certified that no service appeal on the subject has earlier been filed before this Hon'ble Tribunal.

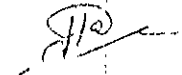
Appellant
Through Counsel



AFFIDAVIT:

I, **Hashmat Khan** son of Gulla Khan r/o Darazinda Tehsil Darazinda District Dera Ismail Khan, the appellant, do hereby solemnly affirm and declare on Oath that contents of the service appeal are true and correct to the best of our knowledge and belief; and nothing has been deliberately concealed from this Hon'ble Tribunal.

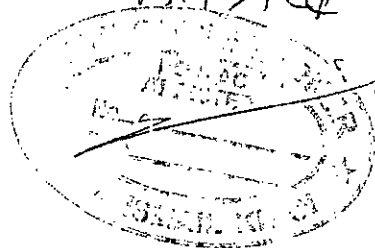
Dated: 12 /10/2023



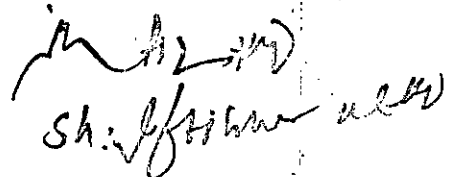
DEPONENT

CNIC# 29301-3441936-1

Attested



Identified by Counsel





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Ann. A

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN**

WORKING PAPER FOR APPOINTMENT OF SST (Gen), SST (Bio/Chem), SST (Phy/Maths),
And SST-IT, BPS-16 (MALE) IN Sub Division Darazinda, District DIKhan.

In pursuance of Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre dated 13/11/2012, amended vide notification of even No. dated 07.03.2018, Appointment of Teaching Cadre Employees for one year, on adhoc/contract basis through ETEA, Pakistan to the Posts of SST (Gen), SST (Bio/Chem), SST (Phy/Math) SST-IT (EPS-16) was carried out adopting THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION & TRANSFER) RULES, 1989, Part I, Rule 2(1) (c), Rule 4 (3) and Rule 5, under THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION & TRANSFER) RULES, 1989, Rule 10 Sub Rule (2), Sub Rule (5) and Sub Rule (7) for Appointment on Open Merit, on 2 % Quota Reserved for Disable candidates and on 5% Reserved for Candidates on Minorities Quota.

A committee comprising of the following Officers/Officials was constituted vide Office of the District Education Officer Sub.Division Darazinda, D.I.Khan, Notification No:7122-95 Dated 20-05-2021 & Directorate of E&SE Peshawar No.6778-93 Dated:25-05-2021 and conferred upon the manifesto to check and scrutinize the original documents of candidates as per provisional merit list provided by ETEA and to revise it subject to scrutiny of the Original Documents in order to complete the process of recruitment in the best interest of public service.

| | | |
|----|--|--|
| 1. | Dr. Qamar Zaman Principal GHS Prova DIKhan | Representative of Chairman of DSC |
| 2. | Muhammad Saleem Principal GCMHS No.1, Tank. | Representative of Directorate of E&SE, Peshawar. |
| 3. | Jamshed Khap Principal GHS Khoi Bahara | Member |
| 4. | Muhammad Rafiq Assistant o/o DEO Office SD Darazinda | Member |
| 5. | Dauran Khan ASDEO o/o DEO Office SD Darazinda | Member |
| 6. | M. Shafiqullah CO o/o DEO Office SD Darazinda | Member |

This scrutiny committee physically checked the original Documents/ testimonials of all the appeared candidates for the posts of SST (Gen), SST (Bio/Chem), SST (Phy/Math) SST-IT (BPS-16) at District Education Office SD Darazinda DIKhan and Provisional selection lists were prepared as per the following selection criteria:

Selection Criteria

| Category of Qualification | (Total Marks 200) |
|---|-----------------------------------|
| SSC | Marks Obtained X 20/ total Marks. |
| HSSC | Marks Obtained X 20/ total Marks. |
| BA/BSC | Marks Obtained X 20/ total Marks. |
| MA/MSC | Marks Obtained X 20/ total Marks. |
| B.Ed | Marks Obtained X 05/ total Marks. |
| M.Ed | Marks Obtained X 05/ total Marks. |
| MS/M. Phil/ | Marks Obtained X 05/ total Marks. |
| P.Hd | Marks Obtained X 05/ total Marks. |
| Academic + Professional Qualification Marks | Total Marks 100 |
| ETEA Test Marks | Marks 100 |
| In case 4 year BS Program/BSc Hon if equivalent to Master Degree shall be calculated as marks obtained X 40 (20 for BA/BSc + 20 for MA/MSc)/Total marks | |
| ETEA & Qualification Marks | Total Marks 200 |

Attested to be true copy

SECONDARY SCHOOL TEACHER GENERAL (MALE) BPS-16 ON ADHOC BASIS

OPEN MERIT:

05 Nos vacant posts of SST (Gen) were advertised. The scrutiny committee proposed the following 05 (Five) eligible, meritorious and deserving candidates for appointment against the posts of SST (Gen) (BPS-16), on the Open Merit at District Level.

| S.No | Roll No | Name | Father Name | CNIC | D.O.B | Total Score | Remarks |
|------|---------|--------------|--------------|--------------|------------|-------------|--------------------------------|
| 1. | 104198 | ASAL JAN | QAIZAR KHAN | 223012522659 | 01/01/1995 | 127.59 | Recommended |
| 2. | 104353 | KHATEEB KHAN | DAUD KHAN | 223012220459 | 04/01/1996 | 122.09 | Recommended for SST (Bio/Chem) |
| 3. | 100723 | ALAM NAZAR | NAIK NAZAR | 223019444343 | 01/04/1992 | 116.79 | Recommended |
| 4. | 103577 | WAKIL KHAN | DAUD KHAN | 223015223107 | 23/03/1990 | 113.91 | Recommended |
| 5. | 103377 | BARKAT ULLAH | MIRABAT KHAN | 122018293478 | 17/03/1988 | 112.79 | Recommended |
| 6. | 103165 | HABIB KHAN | DAWOOD KHAN | 223015985603 | 17/03/1985 | 112.14 | Recommended |

DISABLE QUOTA:

Total Sanctioned Posts of SST in SD Darazinda are 43. According to 25% initial recruitment Total SST Posts are 11 Nos. 2% disable quota out of 11 posts become $(11 \times 2 / 100 = 0.22)$. Hence, no post of disable quota has been recommended.

MINORITIES QUOTA:

No one Candidate has applied in Minority quota for the posts of SST.

ii. SECONDARY SCHOOL TEACHER BIO/CHEMISTRY (MALE) BPS-16 ON ADHOC BASIS

OPEN MERIT:

Only 01 Nos vacant post of SST-Bio/Chem was advertised. The scrutiny committee proposed the following 01 (One) eligible, meritorious and deserving candidate for appointment against the posts of SST (Bio/Chem) (BPS-16), on Open Merit at District Level.

| S.No | Roll No | Name | Father Name | CNIC | D.O.B | Total Score | Remarks |
|------|---------|--------------|-------------|---------------|------------|-------------|-------------|
| 1. | 61354 | KHATEEB KHAN | DAUD KHAN | 2230122204593 | 04/01/1995 | 120.08 | Recommended |

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True copy

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SECONDARY SCHOOL TEACHER PHY/MATH (MALE) BPS-16, ON ADHOC BASIS

OPEN MERIT:

03 Nos vacant posts of SST-Math/Phy were advertised.

The scrutiny committee proposed the following 03 (three) eligible, meritorious and deserving candidates for Appointment against the posts of SST (Phy/Math) (BPS-16), on Open Merit at District Level.

| S.No | Roll No | Name | Father Name | CNIC | D.O.B | Total Score | Remarks |
|------|---------|------------------|-----------------|---------------|------------|-------------|-------------|
| 1. | 71177 | HASIL UR REHMAN | HABIB UR REHMAN | 2230154568297 | 07/05/1993 | 108.01 | Recommended |
| 2. | 71284 | ABDUL BASIT KHAN | DARAZ KHAN | 1210280119831 | 17/12/1995 | 102.27 | Recommended |
| 3. | 71186 | INAM ULLAH | AHMAD KHAN | 2230179404651 | 07/11/1993 | 100.47 | Recommended |

iv. SECONDARY SCHOOL TEACHER I.T. (MALE) BPS-16, ON ADHOC BASIS

OPEN MERIT:

04 Nos. vacant posts of SST-IT were advertised.

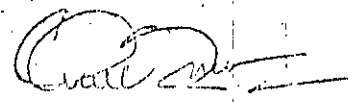
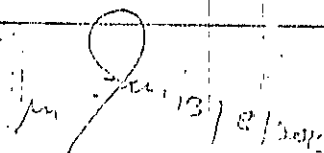
The scrutiny committee proposed the following 04 (Four) eligible, meritorious and deserving candidates for Appointment against the posts of SST -I-T (BPS-16), on Open Merit at District Level.

| S.No | Roll No | Name | Father Name | CNIC | D.O.B | Total Score | Remarks |
|------|---------|-----------------------|----------------|---------------|------------|-------------|-------------|
| 1. | 81233 | BILAL SHAH | ZARAB DIN SHAH | 2230158929249 | 11/09/1994 | 115.98 | Recommended |
| 2. | 81242 | MUHAMMAD NAQEEB ULLAH | FAIZ ULLAH | 3210337792609 | 12/12/1994 | 106.57 | Recommended |
| 3. | 81359 | RAUF SHAH | SHAH JAHAN | 1210190668395 | 01/05/1997 | 99.52 | Recommended |
| 4. | 81080 | HASHMAT KHAN | GULLA KHAN | 2230134419351 | 27/12/1989 | 97.86 | Recommended |


DISABLE QUOTA:

One Nos of Candidate has applied for the post of SST-IT in Disable quota. However the Committee calculated 2% of 05 (Five) Nos Sanctioned Posts, (5/100x2) which equals 0.1, hence does not deserve to be allocated a Complete 1 (One) Nos of posts. Therefore, is need of making merit list.

RECOMMENDED AND SIGNED BY SCRUTINY COMMITTEE

| | | | |
|----|---|--|---|
| 1. | Dr. Qamar Zaman Principal GHS Prova DIKhan | Representative of Chairman of DSC |  |
| 2. | Muhammad Saleem Principal GCMHS No.1, Tank. | Representative of Directorate of E&SE, Peshawar. |  |

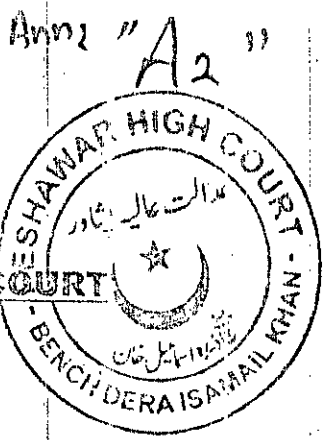



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| | | | |
|----|--|--------|--------------------|
| 3. | Jam. Khan Principal GHS Khoi Bahara | Member | <i>J. Khan</i> |
| 4. | Muhammad Rafiq Assistant o/o DEO Office SD Darazinda | Member | <i>[Signature]</i> |
| 5. | Dauran Khan ASDEO o/o DEO Office SD Darazinda | Member | <i>Dauran</i> |
| 6. | M. Shafqatullah CO o/o DEO Office SD Darazinda | Member | <i>[Signature]</i> |

[Signature]
DISTRICT EDUCATION OFFICER
(MALE), DERA ISMAIL KHAN

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Attested To be
true copy



**BEFORE THE HONOURABLE PESHAWAR HIGH COURT
DERA ISMAIL KHAN BENCH.**

Writ Petition No. _____ -D of 2021

Samiullah Khan son of Resham Khan, resident of Khoi Bahara Sharqi, Tehsil Darazinda, District D.I.Khan; presently residing at Draban Kalan, District D.I.Khan.

Petitioner

VERSUS

- Files 100/2021-2022
Adm. Registrar
1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary Secondary & Education Department, D.I.Khan.
 2. Secretary to Govt. of Khyber Pakhtunkhwa, Elementary Secondary & Education Department, D.I.Khan
 3. Director, Elementary Secondary & Education Department, D.I.Khan.
 4. District Education Officer (Male), Education Department, sub-Division Darazinda, D.I.Khan.
 5. Education Testing & Evaluation Agency (ETEA), through its Chairman, Phase 7, Sector E-8, Street 13, Plot no 22 near Hajj Complex Hayatabad, Peshawar.

Respondents

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN, 1973.**

Respectfully Sheweth,

1. That the addresses of parties as given above, are correct & sufficient for the purpose of service.

WP NO.410-D of 2021 (Grounds)

ATTEST
EXAMINER
Peshawar High Court Bench.
Dera Ismail Khan
30/07/2021

2. That the petitioner is a permanent & bona-fide resident of sub-Division Darazinda, D.I.Khan having BSCS (*Bachelor of Science in Computer Science*) equivalent to Master Degree with B.Ed. Copies of the Domicile Certificate and academic documents of the petitioner are enclosed as Annexure A.
3. That the petitioner is physically disable person from his both legs but this disability in no way create any hurdle or difficulty in performance of the work. In this connection a Disability Certificate issued by the Govt. of Khyber Pakhtunkhwa, Provincial Council for the Rehabilitation of Disable Person is enclosed as Annexure B. In the said certificate the 'Assessment Board for the Disabled Persons' recommended the petitioner "*Fit to work*".
4. That the respondent No.3 advertised the various posts of teachers through ETEA and in this regard list of vacancies was also published on the internet over the website of ETEA. The said list of vacant positions was signed by the Deputy Director (Estab) according to which there were four posts of SST (IT) B-16. The breakup of vacancies of Sub-division Darazinda is as under:

Filed today
26/06/22
Addl. Registrar

12. SD Darazinda

| Nomenclature of Vacancy | Male | Female |
|-------------------------|-----------|----------|
| SST (Gen) B-16 | 5 | 1 |
| SST (Phy/Maths) | 3 | 2 |
| SST (Bio Chem) | 1 | 0 |
| SST (IT) B-16 | 4 | 0 |
| Total | 13 | 3 |
| CT B-15 | 13 | 7 |
| DM B-15 | 8 | 5 |
| PET B-15 | 7 | 5 |

(A)

TESTED
EXAMINOR
Pasnowar High Court Bench,
Bera Ismail Khan
30/07/22

| | | |
|-------------------|-----------|-----------|
| AT B-15 | 8 | 5 |
| TT B-15 | 0 | 0 |
| Qari B-12 | 2 | 0 |
| CT /Lab In-charge | 0 | 0 |
| PST B-12 | 26 | 13 |
| Total | 64 | 40 |

(B)

Filed In
 Addl. Registrar

[Handwritten Signature]

Thus there were total $64+13=77$ male vacancies and $40+3=43$ female vacancies and therefore, total vacancies in Sub-Division Darazinda were $77+43=120$.

Copy of the advertisement is enclosed as Annexure C.

Copy of list of vacant positions is enclosed as Annexure D.

5. That according to the Advertisement, 2% quota was reserved for disable candidates. Thus, petitioner applied for the post of SST (IT) BPS-16 through ETEA wherein a column for Disable Candidates was provided with the query "Are you Disable" and the petitioner replied the said query as "YES".
6. That the petitioner applied for the Post of SST (IT) being qualified and eligible and after the ETEA Test, petitioner obtained **107.17 marks** and was placed at Serial No.5 in the provisional merit list out of four vacancies of SST-IT.

Copy of provisional merit list is enclosed as Annexure E.

7. That according to Section 10(3) of the Disabled Persons' (Employment and Rehabilitation) Ordinance, 1981, amended by the Khyber Pakhtunkhwa Disabled Persons (Employment and Rehabilitation) (Amendment) Act, 2012, while calculating the percentage of the posts in an establishment for the purposes of employment of disabled persons, the fraction of 2 and above shall

ATTEST.

EXAMINOR
 Pesnawar High Court Bench,
 Wazir Ismail Khan

30/07/2022

count as a whole number. Hence, not less than 2% of 120 advertised vacancies in sub-Division Darazinda becomes "2.4" and as the fraction (4) is greater than the fraction of 2 therefore, the same would be counted as a whole figure and in this way, there were 3 vacancies for disable persons. But as total strength of teachers in sub-Division Darazinda is much more therefore, there would be even more vacancies for appointment against disable quota.

8. That the petitioner was entitled to be appointed on the basis of disable quota of 2% out of total vacancies but respondents, despite repeated requests of petitioner, are not taking into account his rights of appointment on disability quota.

9. That now the petitioner has been left with no other remedy but to invoke the constitutional jurisdiction of this Honourable Court seeking issuance of direction to respondents to appoint him as SST (IT) against quota of disable persons on, inter alia, the following grounds:

GROUND:

- i. That inaction of respondents in complying with the recruitment policy of the provincial government as to disable persons is against law, facts, without jurisdiction, without lawful authority and having no binding effect upon rights of the petitioner accrued to him by dint of his disability.
- ii. That the respondent No.3 advertised the various posts of teachers through ETEA and in this regard list of vacancies was also published on the internet over the website of ETEA. The said list of vacant positions was signed by the Deputy Director (Estab)

TESTED.

EXAMINER

Peshawar High Court Bench,
Dea Ismail Khan

30/07/2022

Filed for 2283
Hdqr. Registrar
26/07/22

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according to which there were four posts of SST (IT) B-16. The breakup of vacancies of Sub-division Darazinda is as under:

12. SD Darazinda

| Nomenclature of Vacancy | Male | Female |
|-------------------------|-----------|-----------|
| SST (Gen) B-16 | 5 | 1 |
| SST (Phy/Maths) | 3 | 2 |
| SST (Bio Chem) | 1 | 0 |
| SST (IT) B-16 | 4 | 0 |
| Total | 13 | 3 |
| CT B-15 | 13 | 7 |
| DM B-15 | 8 | 5 |
| PET B-15 | 7 | 5 |
| AT B-15 | 8 | 5 |
| TT B-15 | 0 | 0 |
| Qari B-12 | 2 | 0 |
| CT /Lab In-charge | 0 | 0 |
| PST B-12 | 26 | 18 |
| Total | 64 | 40 |

(A)

(B)

Filed 10/07/22
 Adm. Registrar
 28/07/22

iii. That the petitioner applied for the Post of SST (IT) being qualified and eligible and after the ETEA Test, petitioner obtained **107.17 marks** and was placed at Serial No.5 in the provisional merit list out of four vacancies of SST-IT.

According to Section 10(3) of the Disabled Persons' (Employment and Rehabilitation) Ordinance, 1981, amended by the Khyber Pakhtunkhwa Disabled Persons (Employment and Rehabilitation) (Amendment) Act, 2012, while calculating the percentage of the posts in an establishment for the purposes of employment of disabled persons, the fraction of 2 and above shall count as a whole number. Hence, not less than 2% of 120

ATTEST.
 EXAMINOR
 Peshawar High Court Bench

30/07/22

advertised vacancies in sub-Division Darazinda becomes "2.4" and as the fraction (4) is greater than the fraction of 2 therefore, the same would be counted as a whole figure and in this way, there were 3 vacancies for disable persons. But as total strength of teachers in sub-Division Darazinda is much more therefore, there would be even more vacancies for appointment against disable quota.

iv. That petitioner applied for the post of SST (IT) BPS-16 through ETEA wherein a column for Disable Candidates was provided with the query "Are you Disable" and the petitioner replied the said query as "YES". The petitioner was entitled to be appointed on the basis of disable quota of 2% i.e. 03 vacancies out of total 120 vacancies but respondents, despite repeated requests of petitioner, are not taking into account his rights of appointment on disability quota.

v. That not less than 2% quota vacancies are to be calculated on the basis of total strength in the Department and not on the basis of advertised vacancies. In this regard a three-member bench of the august Supreme Court of Pakistan was pleased to hold:

"Summarizing the above we hold that: (i) The 2% (and now 3%) Disability Quota is to be calculated on the basis of the total sanctioned posts of the establishment. (ii) In order to ensure fair and equitable representation of persons with disabilities (PWDs) in every tier of the establishment, the total Disability Quota is to be further apportioned and allocated amongst different categories of posts in the establishment. The determination of different categories is on the basis of their distinct

Filed today
Addl. Registrar

WP NO.410-D of 2021 (Grounds)

ATTEST
EXAMINOR
Peshawar High Court Bench,
Dera Ismail Khan
(30/07/2022)

qualifications, selection criteria and separate merit list. (iii) In case the sanctioned strength of a post is less than 50, it will be for the establishment to allocate seat(s) from the overall Disability Quota against such a post (iv) if a particular post is not fit for a PWD, the establishment may shift the Disability Quota and adjust it against another post in the establishment so that the overall Disability Quota is not disturbed and maintained at all times. (v) The advertisement for any category of post must clearly provide the total Disability Quota for that category of posts and the number of seats vacant under the said Disability Quota at the time of the advertisement."

Filed Today 2-9-23
Addl. Registrar

- vi. That the right of petitioner for appointment as SST(IT) BPS-16 against disability quota is his vested legal and constitutional right which cannot be denied.
- vii. That the petitioner is having physical Disability from his both legs which disability cannot in any way be a hurdle/problem in performance of his duties as Secondary School Teacher Information Technology (SST-IT). Moreover, in the Disability Certificate issued by the Govt. of Khyber Pakhtunkhwa, Provincial Council for the Rehabilitation of Disable Person, the 'Assessment Board for the Disabled Persons' also recommended the petitioner "Fit to work". By not appointing him as SST-IT, a great injustice has been done to the petitioner.
- viii. That the counsel for petitioner may be allowed to raise additional grounds at the time of hearing.

WP NO.410-D of 2021 (Grounds)

ATTEST:
EXAMINOR
Peshawar High Court Bench,
Dera Ismail Khan

30/07/2022

It is, therefore, humbly prayed that on acceptance of the present Writ Petition and by issuance of an appropriate writ, order or direction directing respondents to appoint the petitioner as SST (IT) BPS-16 against Disable Person Quota by complying with the policy of the provincial government. Any other appropriate remedy which this Honourable Court, in the given circumstances, may deem appropriate in the interest of justice may also be granted to the petitioner.

Yours Humble Petitioner

Filed today
 29/06/21
 Addl. Registrar

(Signature)
 (Samullah Khan)
 Through Counsel

Dt. 25 June, 2021.

(Signature)

Ahmad Ali
 Advocate Supreme Court.

(Signature)

Miss Shumaila Awan
 Advocate High Court, D.I.Khan.

Books Referred

1. Constitution of Islamic Republic of Pakistan, 1973.
2. Disabled Persons' (Employment and Rehabilitation) Ordinance, 1981

TESTED.

EXAMINOR
 Pasnowar High Court Bench,
 Dera Ismail Khan

30/07/22

BEFORE THE HONOURABLE PESHAWAR HIGH COURT
DERA ISMAIL KHAN BENCH.

Writ Petition No. _____-D of 2021

Samiullah Khan Vs. Govt. of K.P.K. etc
Writ Petition

Certificate

I, *Samiullah Khan son of Resham Khan, resident of Khoi Bahara Sharqi, Tehsil Darazinda, District D.I.Khan; presently residing at Draban Kalan, District D.I.Khan, petitioner*, do hereby certify that it is the first petition on behalf of petitioner. No such petition has ever been preferred in this Honourable Court.

Filed 16/07/2022
 M. Ali, Registrar

Samiullah Khan
 Petitioner

Affidavit

I, *Samiullah Khan son of Resham Khan, resident of Khoi Bahara Sharqi, Tehsil Darazinda, District D.I.Khan; presently residing at Draban Kalan, District D.I.Khan, petitioner*, do hereby solemnly affirm and declare on oath that all the Para-wise contents of above **Writ Petition** are true & correct to the best of my knowledge and belief and nothing has been deliberately concealed from this Honourable Court.

Ahmad Ali, ASC
Identified by Counsel:
Ahmad Ali, ASC.

Samiullah Khan
DEPONENT

12/04-7597698-9

WP NO.410-D of 2021 (Grounds)


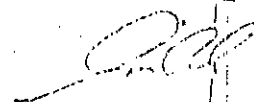
EXAMINOR
 Peshawar High Court Bench,
 Dera Ismail Khan

30/07/2022

- 20 - Ann; "A3"

PESHAWAR HIGH COURT, D.I. KHAN BENCH

FORM OF ORDER SHEET

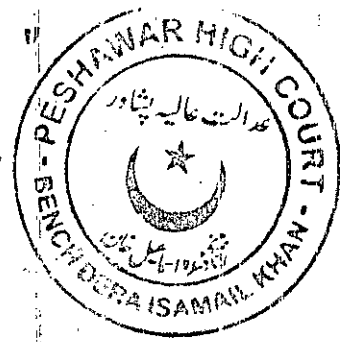
| Date of Order or proceedings (1) | Order or other proceedings with signature of Judge(s). (2) |
|-------------------------------------|---|
| 14.9.2021 | <p><u>W.P No. 410-D/2021</u></p> <p><u>Present:</u> Mr. Ahmad Ali Khan, Advocate for the petitioner.</p> <p>***</p> <p>Comments be called from respondents No. 3 & 4 so as to reach this Court within a fortnight. Adjourned and be fixed in the 2nd available D.B.</p> <p><u>C.M No. 713-D/2021</u></p> <p>Notice. In the meanwhile, respondents are directed not to fill-up one vacancy of SST-IT under disable quota till further order.</p> <div style="text-align: right;">  <u>JUDGE</u>  <u>JUDGE</u> </div> |
| (D.B) | <p>Hon'ble Mr. Justice Abdul Shakoor Hon'ble Mr. Justice Sanibzada Asadullah</p> |

File
16/09

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Annⁿ A/S



Judgment Sheet
IN THE PESHAWAR HIGH COURT,
D.I.KHAN BENCH
(Judicial Department)

Writ Petition No.410-D/2021 with
CMs No.713, 996, 1079-D/2021 and 15, 60, 119-D/2022

Samiullah Khan
Versus
Govt. of Khyber Pakhtunkhwa and others

JUDGMENT

For Petitioner: Mr. Ahmad Ali Advocate.

For Respondents: Mr. Adnan Ali Assistant Advocate General for
respondents No.1 to 4.

Sheikh Iftikhar-ul-Haq Advocate for
respondent No.5.

Date of hearing: 29.06.2022

MUHAMMAD FAHEEM WALLI, J.- Petitioner, through this
petition, filed Article 199 of the Constitution of Islamic Republic
of Pakistan, 1973, has sought the following relief:

*It is, therefore, humbly prayed that on
acceptance of the present Writ Petition and
by issuance of an appropriate writ, order or
direction directing respondents to appoint*

TESTE
EXAMINOR

Peshawar High Court Bench,
Dera Ismail Khan.

30/07/2022

the petitioner as SST (IT) BPS-16 against Disable Person Quota by complying with the policy of the provincial government. Any other appropriate remedy which this Honourable Court, in the given circumstances, may deem appropriate in the interest of justice may also be granted to the petitioner.

2. Concise facts of the case are that the petitioner having Bachelor of Science in Computer Science, with Bachelor in Education, applied for the post of SST (IT) in the Education Department D.I.Khan, sub-Division Darazinda, through the Education Testing & Evaluation Agency (ETEA). In the advertisement 2% quota for persons with disability was mentioned. Finally, the petitioner secure 107.17 marks and placed at 5th position in the merit list meant for four vacancies of SST(IT). Respondent No.5, having 4th position in the merit list, was recommended for appointment against 4th vacancy of SST(IT), however, petitioner through instant petition, asserted his rights on the said vacancy on the basis of disable quota.

3. Respondents No.3 & 4, in compliance of the directions of this Court, submitted their para-wise comments, followed by

ATTEST
EXAMINER
Peshawar High Court Bench,
Dera Ismail Khan
30/07/02

better comments, wherein they opposed the issuance of desired writ mainly on the ground that vacancies fall under 2% disable quota have recently advertised by the Department separately.

4. Arguments of the learned counsel for parties heard and record gone through with their valuable assistance but for the sake of brevity, without reproducing the arguments of the counsels, same will be adequately dealt with at appropriate stages in this judgment.
5. Record reveals that four vacancies of SST(IT) were advertised and candidates were required to submit their online applications through ETEA. The petitioner too filed his candidature and after written test etc, he placed at Serial No.5 of the merit list whereas, respondent No.4 was placed at serial No.4 of the list. The petitioner filed instant petition seeking appointment on the fourth vacancies on the basis of 2% quota reserved for disabled persons. There is no denial of the fact that 2% quota for disable candidates was referred in the advertisement and also proportionate share of the disable persons in the concerned sub-division is less than 2%, yet according to the Department, all the four vacancies were for the purpose of appointment on open merit and petitioner too applied on the said basis; therefore, no separate merit list for disable persons was provided to the Department by

ATTEST

EXAMINOR

Pasnowar High Court Bench,
Dera Ismail Khan

30/7/22

the ETEA. This contention of the Department finds support from the advertisement, annexed with better comments, inviting applications from persons with disability, whereby, posts for 2% disable quota were separately advertised. Admittedly and undeniably, the petitioner could not compete on open merit for his appointment against four advertised vacancies of SST(IT), therefore, he was rightly not considered for appointment.

6. In this view of the foregoing discussion, we find no merit in this petition which is therefore, dismissed and all the listed CMAs, for having become infructuous, stand disposed of accordingly.

Announced

29.06.2022

(*M/Subhan)

*File
by
Hr
01/07*

JUDGE

JUDGE

ATTEST

EXAMINOR

Peshawar High Court Bench,
Dera Ismail Khan

30/07/22

DB:

Hon'ble Mr. Justice Ijaz Anwar, and
Hon'ble Mr. Justice Muhammad Faheem Wali



- 25 -

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**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN**

NOTIFICATION:

Consequent upon the recommendations of the Departmental Selection Committee, the following candidates are appointed to the post of SST (G), SST (B/C), SST (P/M) and SST-IT Male in BPS-16 (Rs. 18910-1520-64510) @ Rs.18910/-fixed plus usual allowances as admissible under the rules on adhoc/contract basis under the existing policy of the Provisional Government in Teaching Cadre, on the terms and conditions as given below with immediate effect, since their services has been placed at the disposal of the undersigned vide Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar Notification No.14763-69/F.No 01/SSTs Contract Appointment (Male) dated 29-10-2021, so they are hereby posted /adjusted against the vacant advertised posts in the schools/stations noted against each.

1. Appointment of Secondary School Teacher (Gen) Male BPS-16 on Adhoc Basis.

| S.N o | Roll No | Name | Father Name | CNIC | D.O.B | Total Score | Place of Posting |
|-------|---------|--------------|--------------|---------------|------------|-------------|------------------|
| 1. | 100723 | ALAM NAZAR | NAIK NAZAR | 2230194443433 | 01/04/1992 | 116.79 | GMS Tour Kani |
| 2. | 103577 | WAKIL KHAN | DAUD KHAN | 2230152231077 | 23/03/1990 | 115.91 | GMS Tijree |
| 3. | 103377 | PARKAT ULLAH | MIRABAT KHAN | 1220182914785 | 17/03/1988 | 112.79 | GHS Raghassar |

2. Appointment of Secondary School Teacher (Bio/Chemistry) Male BPS-16 on Adhoc Basis.

| S.N o | Roll No | Name | Father Name | CNIC | D.O.B | Total Score | Place of Posting |
|-------|---------|--------------|-------------|---------------|------------|-------------|------------------|
| 1. | 61354 | KHATEEB KHAN | DAUD KHAN | 2230122204593 | 01/01/1996 | 120.08 | GHS Landi Baloch |

3. Appointment of Secondary School Teacher (Physics/Math) Male BPS-16 on Adhoc Basis.

| S.N o | Roll No | Name | Father Name | CNIC | D.O.B | Total Score | Place of Posting |
|-------|---------|------------------|-----------------|---------------|------------|-------------|------------------------|
| 1. | 71177 | HASIL UR REHMAN | HABIB UR REHMAN | 2230154568297 | 07/05/1993 | 108.01 | GHS Tijree |
| 2. | 71284 | ABDUL BASIT KHAN | DARAZ KHAN | 1210280119831 | 17/12/1995 | 102.27 | GHS Landi Baloch |
| 3. | 71186 | INAM ULLAH | AHMAD KHAN | 2230179404651 | 07/11/1993 | 100.47 | GHS Jalal Khan Parwana |

*Sent
Attested
True copy*

*جنگل جلال خان پاروانہ
(SST-IT)
(BPS-16)*

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4. Appointment of Secondary School Teacher (I.T) Male BPS-16 on Adhoc Basis.

| Roll No | Name | Father Name | CNIC | D.O.B | Total Score | Place of Posting | |
|---------|-------|-----------------------|----------------|---------------|-------------|------------------|------------------|
| 1. | 81233 | BILAL SHAH | ZARAF DIN SHAH | 3210158279249 | 11/09/1994 | 115.98 | GHS Khol Behara |
| 2. | 81242 | MUHAMMAD NAQEEB ULLAH | FAIZ ULLAH | 3210387792609 | 12/12/1994 | 106.57 | GHS Darazinda |
| 3. | 81359 | RAUF SHAH | SHAH JAHAN | 1210190668395 | 01/05/1997 | 99.52 | GHS Landi Haloch |

TERMS AND CONDITIONS:

1. Not TADA is allowed.
2. Charge Report should be submitted to all concerned in duplicate.
3. Their Appointment is made purely on temporary and contract basis, initially, for one year from the date of issuance of order.
4. They should not be handed over charge if they exceed 35 years or fall below 18 years of age. Age relaxation case may be submitted to the competent authority (if required).
5. If any meritorious candidate is deprived of appointment by this order and the competent authority accept his appeal, the appointment order of the low merit candidate will be with-drawn and the adjustment order will be reviewed according to the merit.
6. Appointment is subject to the condition that the certificates documents must be verified from the concerned authority by the DEO (Concerned). Any one found producing bogus certificate will be reported to the law enforcing agencies for further action and his appointment order shall be annulled from the date of its issuing.
7. Their services are liable to termination on one month's notice from either side. In case of leaving the department without notice their one month pay/allowances shall be forfeited to the Government.
8. Pay will not be drawn unless a Pay Release Order is issued by the Undersigned after receipt of verification from the Board/ University/ Degree Awarding Institutes concerned.
9. They should join their post within 30 days of the issuance of this notification. In case of failure to join the post within 30 days, the appointment will expire automatically and no subsequent appeal shall be entertained.
10. Health and Age certificate should be produced from the Medical Superintendent concerned before taking over charge.
11. Their services shall be terminated at any time, in case his performance is found unsatisfactory during the contract period. OR will be extended for another year if found satisfactory.
12. The appointment is made on school based. They will have to serve at the place of posting and their services are not transferable to any other station.
13. Before handing over charge, once again their documents may be checked by the Head Master/Principal (concerned) if they have not acquired the relevant qualifications as per rules, they may not be handed over the charge of the post and the case may be report to the Directorate ESSE, for with-drawl of order.
14. The appointees shall take nine (09) months mandatory training at RITE or PITE/FITE/COET.
15. In case of not possessing B Ed Degree by SST (IT) candidates, the appointees shall pass B.Ed within 03 years subject to the condition that if their contract is extended or services regularized. However, in case of failure to pass B Ed within the stipulated period, their appointments order shall stand cancelled automatically, under the rules notified vide Notification No SO/G/E&SEM-85/7/2017 dated 24-04-2017.

DISTRICT EDUCATION OFFICER
(MALE), DERA ISMAIL KHAN

Endst: No 7761-79
Copy to th:-

Dated 09/11 2021.

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Additional Director (Estab) Merged Areas Peshawar.
3. Deputy Commissioner, DIKhan.
4. District Comptroller of Accounts, DIKhan.
5. Deputy District Education Officer (M) DIKhan.
6. District Monitoring Officer EMA, DIKhan.
7. Principal/Head Master Concerned.
8. Official concerned.
9. Master File.

DISTRICT EDUCATION OFFICER
(MALE), DERA ISMAIL KHAN

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(SST - I.T)
(BPS - 16)

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NOTIFICATION

Consequent upon the advertisement bearing No: INF (P) 6079/2021, and the recommendations of the Departmental Selection Committee, the following candidate is appointed against the post of SST (IT) Male in BPS-16 (Rs. 18910-1520-64510) @ Rs. 18910/- fixed plus usual allowances as admissible under the rules on adhoc / contract basis as per existing policy of the Provincial Government, in Teaching Cadre, on the terms and conditions as given below with immediate effect:

ITEM NO.1. SST (IT) MALE (BPS-16)

| Sr No | Roll No | Name of Candidate & Father's Name | D/O Birth | CNIC | Permanent Address | Acad Marks (out of 100) | ETEA Marks (out of 100) | Total Marks (out of 200) | Remarks |
|-------|---------|-----------------------------------|------------|-----------------|-------------------|-------------------------|-------------------------|--------------------------|--|
| 1 | 51020 | Hashmat Khan SD Gulzar Khan | 27-12-1989 | 22805-3110200-1 | Darazinda DIKhan | 51.86 | 44 | 97.86 | Appointed and Services are placed at the disposal of District Education Officer (NI) DIKhan for adjustment against the vacant post of SST (IT) |

Terms and Conditions:-

- The DEO is directed to adjust / post the appointees against the school / post already advertised on the web-site of ETEA. No corrigendum against a non-advertised post will be made by District Education Officer at any cost.
- No. T/VDA is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- Appointment is purely made on temporary/contract basis initially for one year with effect from 09-09-2022 to 08-09-2023.
- He should not be handed over charge if his age exceed 35 years or fall below 19 years of age. Age relaxation case may be submitted to the Competent Authority.
- If any meritorious candidate is deprived of appointment by this order, and the Competent Authority accepts his appeal, the appointment order of the low merit candidate will be with-drawn, and the adjustment order will be reviewed according to the merit.
- Appointment is subject to the condition that the certificates / documents must be verified from the concerned authorities by the DEO (concerned). If anyone is found guilty of producing bogus certificate/degree, will be reported to the law enforcing agencies for further action, and his appointment order shall be de-notified from the date of its issuance.
- His services are liable to termination on one month's prior notice from either side. In case of leaving the department without notice, his one month pay / allowances shall be forfeited to the Government treasury.
- Pay will not be drawn until and unless a certificate is issued by DEO (concerned) to the effect that his certificates/degrees are verified and found correct and genuine.
- He should join his posts within 30 days of the issuance of this notification. In case of failure to join the post within 30 days, his appointment will expire automatically and no subsequent appeal shall be entertained.
- Health and Age certificate should be issued by the Medical Superintendent concerned before taking over charge.

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Attested
To be true copy

2023
(SST - I.T) - 6079/2021
(BPS-16)

28-

12. His services shall be terminated at any time, in case his performance is found unsatisfactory during the contract period, or will be extended for another year if found satisfactory.
13. The appointment is made on school based. They will have to serve at the place of posting, and his services are not transferrable to any other station.
14. Before handing over charge, once again his documents may be checked by the Head of the School concerned, and if he has not acquired the relevant qualifications as per rules, he may not be handed over the charge of the post, and the case may be reported to the Directorate of E&SE, for with drawl of order.
15. The appointees shall take nine (09) Months mandatory training at RPDC/DPD.
16. In case of not possessing B.Ed Degrees by SST (IT) candidate, the appointee shall get B.Ed Degree within the stipulated period with effect from the date of issuance of this notification, subject to the condition that if his contract is extended or services regularized. In case of failure in getting B.Ed Degree within the stipulated period, his appointment orders shall stand cancelled automatically, under the Rules Notified vide no. HO (G)/E&SE/1-85/IT/2017, Dated 24-04-2017.

(Hafiz Dr. Muhammad Ibrahim)


DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 8172-78 F.No. 01/SSTs Contract Appointment (Male)/2022
Dated Peshawar the 09/09/2022

Copy of the above is forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (M) DIKhan.
3. District Accounts Officer DIKhan.
4. PS to the Secretary to Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department.
5. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
6. Officials concerned.
7. Master File.


Deputy Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa

حرفت خواتین کے ساتھ ساتھ خواتین کے لیے بھی ایک ایسا اور
خیریت خواتین کے لیے ایسا اور ایسا خیریت خواتین کے لیے ایسا اور

توان: حکمتاً مزید برآں کے لئے لکھنے والے صاحب (Consider)
من اس وقت کے امتحانی کا حکم نامہ ہے 09-09-2022 کے
09-11-2021 کے ساتھ ساتھ
With all Back Benefits
لو جوہر دینے کے ساتھ ساتھ (colleagues) کے ساتھ ساتھ
معاہدہ (Recommendation) کے ساتھ ساتھ

خواتین کے لیے: ایسا اور ایسا اور ایسا اور

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For Insurance Notices see reverse. Rs. Ps.

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acknowledgment is due.

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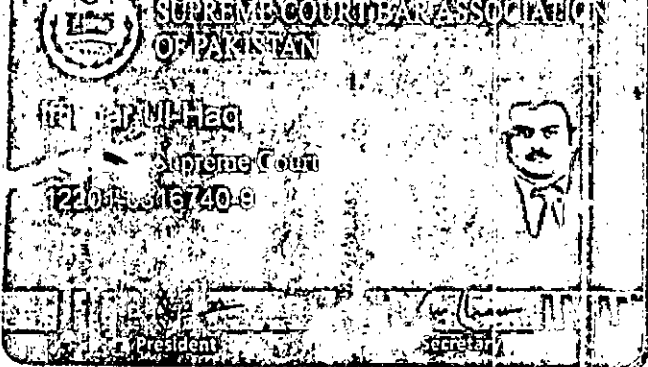
Initials of Receiving Officer
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If insured.

Insurance fee Rs. 2 Ps.
Name and
address
of sender

Weight / Kilo
(in words) Grams

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-31-
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کورٹ
فیصل

Before The **Khyber Pakhtunkhwa Service Tribunal**
Appellant مخائب
Respondent **Govt of K.P.K.**
Service Appeal دوبی باجرم
vis a vis K.P.K.S.T. Act 1974 تعمیر دوبی باجرم

باعتبار غیر آئینگی
Shahin Afshan vs. Govt of K.P.K.

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ذیل پر خود یا اپنا بڑا بڑا برو عدالت حاضر ہوتا رہوں گا اور ہر وقت تیار رہے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر ہوا کرتا ہوں اور مقدمہ میری غیر ماضی کی وجہ سے کسی طور اہل تشرف خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ یا بکھری کے اوقات سے پہلے یا بچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر بکھری کے علاوہ ایک ساعت ہونے یا بروز تعطیل یا بکھری کے اوقات کے آگے یا بچھے میں ہونے پر مطلع کرنی چاہئے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے بنا کرنے یا سخت نہ داپس کرنے کے لئے صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو مل صاحب پر مقدمہ موصوف مشل کردہ ذات خود منظور قبول ہوں اور صاحب موصوف کو عرض، ذمہ داری یا درخواست اجراء اس کے ذمہ داری افرامی اہل تشرف و ہر قسم درخواست برہم کے بیان دینے اور پر مانی یا کسی نامہ و ایصال بر خلاف کرنے یا اپیل ہونا، کا بھی اختیار ہوگا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مقرر بیرون از بکھری صدر بیرونی مقدمہ مقرر نظر ثانی یا وکھری و برآمدگی مقدمہ یا مستثنیٰ آگے ایک طرف یا درخواست حکم استغاثی یا ترقی یا گرفتاری قبل از ایصال اتہاسے ذمہ داری نہیں صاحب موصوف کو بشرط ادا، علیحدہ علیحدہ ذمہ داری کا اختیار ہوگا اور تمام سائنسہ موصوف صاحب موصوف مشل کردہ از خود منظور و قابل ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مقررہ یا اس کے کسی بیرونی کارروائی یا بصورت درخواست نظر حالی اپیل ترقی یا دیگر معاملہ مقدمہ مقررہ کسی دوسرے وکیل یا برسر کو اپنے بنائے یا اپنے ہمراہ مقرر کریں اور یہی اختیار قانون ہوگی ہر امر میں دہی اور دینے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دور نا مقدمہ میں جو کچھ ہر جانب التزام ہے گا وہ صاحب موصوف کا حق ہوگا نیز صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند ہے
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Attendant
 Accepted
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